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MARCH 2, 2022		
CLERK US DISTRICT COURT		
DISTRICT OF NEVADA		
BY:	DEPUTY	

1 Sheri M. Thome, Esq.  
 2 Nevada Bar No. 008657  
 3 **WILSON, ELSER, MOSKOWITZ,**  
**EDELMAN & DICKER LLP**  
 4 6689 Las Vegas Blvd. South, Suite 200  
 5 Las Vegas, Nevada 89119  
 6 Telephone: 702.727.1400  
 Facsimile: 702.727.1401  
 Email: [Sheri.Thome@wilsonelser.com](mailto:Sheri.Thome@wilsonelser.com)  
*Attorneys for Defendant*  
*American Safety Insurance Company*

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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 CROWN LOGISTICS, LLC, a Nevada  
 Limited Liability Company,

11 Plaintiff,  
 12 v.

13 AMERICAN SAFETY INSURANCE  
 14 COMPANY; CONTINENTAL TRUCKING  
 ASSOCIATION, INC.; CONTINENTAL  
 15 INSURANCE AGENCY, INC.; DOES I-  
 XXX; and ABC CORPORATIONS A-Z;  
 16 inclusive,

17 Defendants.

Case No. 3:21-cv-00081-MMD-WGC

**ORDER GRANTING  
 STIPULATION TO EXTEND DISCOVERY  
 DEADLINES (FIFTH REQUEST)**

18 Defendant American Safety Insurance Company (“Defendant American”), by and through  
 19 its counsel of record Wilson, Elser, Moskowitz, Edelman & Dicker LLP, Defendants Continental  
 20 Trucking Association, Inc. and Continental Insurance Agency, Inc. (collectively, the “Continental  
 21 Defendants”), by and through their counsel of record Avalon Legal Group LLC, and Plaintiff Crown  
 22 Logistics, LLC (“Plaintiff Crown”), by and through its counsel of record Leverty & Associates Law  
 23 Chtd., hereby stipulate to extend the scheduled deadlines and seek this Honorable Court’s order in  
 24 accordance with the following terms, pursuant to LR 26-3:

25 **DISCOVERY COMPLETED**

26 To date the parties in this action have conducted discovery as follows:

27 1. On March 11, 2021, the parties conducted their Early Case Conference pursuant to FRCP  
 28 26(f).

2. On March 23, 2021, the parties filed their Stipulated Discovery Plan & Scheduling Order (Doc 15).
3. On March 23, 2021, the Court issued the Discovery Plan & Scheduling Order (Doc 16).
4. On March 25, 2021, Plaintiff Crown served its Initial Disclosures and List of Persons with Knowledge.
5. On March 25, 2021, Continental Defendants served their Initial Disclosures and List of Persons with Knowledge.
6. On March 26, 2021, Defendant American served its Initial Disclosures and List of Persons with Knowledge.
7. On May 13, 2021, Plaintiff Crown served written requests for production of documents onto Defendant American and Continental Defendants.
8. On June 7, 2021, Defendant American issued a subpoena *duces tecum* onto Tri County Independent Insurance Agency, LLC.
9. On June 10, 2021, Tri County Independent Insurance Agency served its response to the subpoena *duces tecum*.
10. On July 7, 2021, Defendant American served its response to Plaintiff Crown's written requests for production, as per a stipulated extension to answer.
11. On July 7, 2021, Defendant American served its first supplemental FRCP 26 disclosures.
12. On July 12, 2021, Defendant American served its second supplemental FRCP 26 disclosures.
13. On July 14, 2021, Continental Defendants served their responses to Plaintiff Crown's written requests for production, as per a stipulated extension to answer.
14. On July 14, 2021, Continental Defendants served their first supplemental FRCP 26 disclosures.
15. On September 1, 2021, Defendant American served written requests for production, requests for admissions, and interrogatories onto Plaintiff Crown.
16. On September 2, 2021, Continental Defendants served written requests for production and interrogatories onto Plaintiff Crown.

1 17. On October 12, 2021, the depositions of Defendant American's three 30(b)(6) witnesses took  
2 place.  
3 18. On October 14, 2021, the depositions of Continental's two 30(b)(6) witnesses took place.  
4 19. On October 15, 2021, defendants received Plaintiff Crown's responses to all sets of discovery  
5 propounded, which had been delayed by the U.S. mail.  
6 20. On December 22, 2021, the depositions of Navneet Prashar and Ravinder Prashar took place.  
7 21. On February 4, 2022, Plaintiff Crown served its third supplemental FRCP 26 disclosures and  
8 supplemental responses to defendants first set of interrogatories.

9 **DISCOVERY THAT REMAINS TO BE COMPLETED**

10 1. Disclosure and depositions of experts.  
11 2. Potential third party discovery.

12 **REASONS FOR REQUESTING AN EXTENSION OF DEADLINES**

13 The parties applied for and received a discovery extension in order to explore settlement  
14 before disclosing experts. [ECF No. 31] However, during that time frame set for settlement  
15 discussions, counsel for American Safety experienced a death in the family, which took her out of  
16 the office for over a week, and delayed the parties' efforts to resolve the case. This stipulation is  
17 intended to allow the parties to have additional time to explore settlement before disclosing experts.  
18 Accordingly, the parties also request the other deadlines similarly be extended.

19 **CURRENT SCHEDULE TO COMPLETE REMAINING DISCOVERY**

20 1. Discovery Cutoff: April 28, 2022  
21 2. Initial Expert Disclosures: February 28, 2022  
22 3. Rebuttal Expert Disclosures: March 28, 2022  
23 4. Dispositive Motions: May 27, 2022  
24 5. Pre-Trial Order: June 27, 2022 (if no MSJ filed)  
25 6. Interim Status Report: February 28, 2022  
26 7. Extension of Scheduled Deadlines: April 4, 2022

27 **PROPOSED SCHEDULE TO COMPLETE REMAINING DISCOVERY**

28 1. Discovery Cutoff: June 6, 2022

2. Initial Expert Disclosures:	April 8, 2022
3. Rebuttal Expert Disclosures:	May 7, 2022
4. Dispositive Motions:	July 5, 2022
5. Pre-Trial Order:	August 5, 2022 (if no MSJ filed)
6. Interim Status Report:	April 8, 2022
7. Extension of Scheduled Deadlines:	May 13, 2022

DATED this 23rd day of February, 2022.

DATED this 23rd day of February, 2022.

AVALON LEGAL GROUP LLC

/s/ *Elena Nutenko*  
Bryan Naddafi, Esq.  
Nevada Bar No. 013004  
Elena Nutenko, Esq.  
Nevada Bar No. 014934  
6030 S. Rainbow Blvd., Suite D1  
Las Vegas, Nevada 89118  
Telephone: (702) 522-6450  
[bryan@avalonlg.com](mailto:bryan@avalonlg.com)  
[elena@avalonlg.com](mailto:elena@avalonlg.com)  
*Attorneys for Continental Trucking  
Association, Inc., and Continental Insurance  
Agency, Inc.*

LEVERTY & ASSOCIATES LAW CHTD

/s/ Patrick R. Leverty  
Patrick R. Leverty, Esq.  
Nevada Bar No. 008840  
Vernon E. Leverty, Esq.  
Nevada Bar No. 001266  
832 Willow St.  
Reno, NV 89502  
Telephone: (775) 322-6636  
pat@levertylaw.com  
gene@levertylaw.com  
*Attorneys for Plaintiff Crown Logistics LLC*

DATED this 23rd day of February, 2022.

**WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP**

/s/ Sheri M. Thome  
Sheri M. Thome, Esq.  
Nevada Bar No. 008657  
6689 Las Vegas Blvd. South, Suite 200  
Las Vegas, Nevada 89119  
Telephone: 702.727.1400  
Email: Sheri.Thome@wilsonelser.com  
*Attorneys for Defendant*  
*American Safety Insurance Company*

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## ORDER

IT IS SO ORDERED. THE NEW DEADLINES ARE:

1. Discovery Cutoff: June 6, 2022
2. Initial Expert Disclosures: April 8, 2022
3. Rebuttal Expert Disclosures: May 7, 2022
4. Dispositive Motions: July 5, 2022
5. Pre-Trial Order: August 5, 2022 (if no MSJ filed)
6. Interim Status Report: April 8, 2022
7. Extension of Scheduled Deadlines: May 13, 2022

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**UNITED STATES MAGISTRATE JUDGE**

DATED: March 2, 2022

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